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**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

) Misc. Case No. \_\_\_\_\_

EX PARTE APPLICATION OF PALANTIR  
TECHNOLOGIES, INC. FOR ORDER  
PURSUANT TO 28 U.S.C. § 1782 TO OBTAIN  
DISCOVERY FOR USE IN FOREIGN  
PROCEEDINGS

**PALANTIR TECHNOLOGIES INC.'S EX  
PARTE APPLICATION FOR AN ORDER  
PURSUANT TO 28 U.S.C. § 1782 TO  
OBTAIN DISCOVERY FOR USE IN  
FOREIGN PROCEEDINGS**

Based upon the accompanying Memorandum of Points and Authorities, and

Declarations of Walrod Prinz zu Waldeck und Pyrmont and Weronika Bukowski (“Bukowski

Declaration”) and the Exhibits attached thereto, Applicant Palantir Technologies Inc. (“Palantir”),

1 through its attorneys, hereby applies to this Court for an Ex Parte Order granting this Application<sup>1</sup> and  
 2 entering the Proposed Order pursuant to 28 U.S.C. § 1782: (i) authorizing Applicant to serve Marc L.  
 3 Abramowitz with the subpoenas attached as Exhibits A and B to the Bukowski Declaration, (ii)  
 4 directing Marc L. Abramowitz to produce documents responsive to the subpoena, (iii) directing  
 5 Mr. Abramowitz to appear for a deposition, (iv) directing Mr. Abramowitz to preserve evidence, and  
 6 (v) such other relief as this Court deems just and proper.

7 Applicant respectfully requests that the Court order the production of documents  
 8 specified to the subpoena, unless otherwise agreed by the parties, on or before August 31, 2018.

### 9 JURISDICTION

10 This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C.  
 11 §§ 1331 and 1782. The Court has personal jurisdiction over the object of the application because  
 12 Mr. Abramowitz resides in the state of California, county of San Francisco.

13  
 14 DATED: August 10, 2018

/s/ Christopher A. Stecher

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 Palantir Technologies, Inc.

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 25 <sup>1</sup> An ex parte application pursuant to 28 U.S.C. § 1782 is appropriate and is the typical procedure  
 26 when invoking this statute. See, e.g., In re Ecuador, No C-10-80225 MISC CRB (EMC), 2010 U.S.  
 27 Dist. LEXIS 102158, at \*7 (N.D. Cal. Sept. 15, 2010) (“[I]t is common for the process of presenting  
 28 the request to a court and to obtain the order authorizing discovery to be conducted ex parte. Such ex  
 part applications are typically justified by the fact that the parties will be given adequate notice of any  
 discovery taken pursuant to the request and will then have the opportunity to move to quash the  
 discovery or to participate in it.”) (Internal quotations and citations omitted).